

**KISH & LIETZ, P.C.**

ATTORNEYS AT LAW

225 PEACHTREE STREET, N.E.  
1700 SOUTH TOWER, PEACHTREE CENTER  
ATLANTA, GEORGIA 30303  
(404) 588-3991  
FACSIMILE: (404) 588-3995

June 13, 2011

The Honorable Dora Irizarry  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: U.S. v. Pauline Wiltshire - CR-11-0164

Dear Judge Irizarry:

I am counsel for Pauline Wiltshire, the Defendant in the above-referenced matter. You have scheduled a status conference in this matter for Friday, June 17, 2011. I am writing to ask that you change the status conference to Friday, August 5, 2011. Furthermore, I ask that the Court exclude the period from today until August 5, 2011 from the calculations under the Speedy Trial Act, 18 U.S.C. §§3161-3174.

Assistant United States Attorney Justin Lerer and I have been engaged in plea discussions. We believe these discussions are likely to result in a disposition of the case without the need for a trial. We ask that the Court exclude the time from today until August 5, 2011 so that we may focus on our plea discussions. We also believe that excluding this time is in the interest of justice and outweighs the Defendant's and the public's right to a speedy trial. Furthermore, Mr. Lerer and I each have matters that will make us unavailable for much of the time during the July. For this additional reason we ask that the Court move the status conference to August 5, 2011.

I have discussed with Ms. Wiltshire her rights under the Sixth Amendment, the Speedy Trial Act, this Court's Rules and Rule 50(b) of the Federal Rules of Criminal Procedure. She understands that her case must be tried within the time periods set out in the Speedy Trial Act. I have informed her that it is in her interest to ask for exclusion of this period of time from the Speedy Trial Act calculations, so that we can have adequate time in which to continue our plea discussions with the Government. She has

The Honorable Dora Irizarry  
June 13, 2011  
Page 2

---

authorized me to therefore request that the Court move the status conference to August 5, 2011.

Respectfully,



Paul S. Kish  
Attorney-at-Law

PSK/pk  
Cc: AUSA Justin Lerer